

Remarks

Applicants thank the Examiner for his careful review of the application.

Claim 20 has been amended to correct two typographical errors. First, claim 20 has been amended to make clear that this claim depends from claim 19. Second, claim 20 has been amended to present the word "a" in lower case, instead of in upper case. These are technical changes and should not be interpreted as changing the scope of claim 20.

Objection to Claims 20-23

Claim 20 has been amended to make clear that it depends from claim 19, not claim 22. Claim 21 now properly depends from claim 20, and claims 22-23 now properly depend from claim 21. In light of this amendment, Applicants respectfully request withdrawal of this objection.

Allowability of Claim 1-17

Each of claims 2-17 depends from independent claim 1. Claims 1-3, and 9 were rejected under 35 U.S.C. §102(b) as being anticipated by United States Patent Number 3,856,990 ("Favreau"). According to the Office Action, Favreau teaches each element recited by independent claim 1, including an "electromechanical radiation collection device in a roll." In fact, Favreau does not teach an electromechanical radiation collection device at all (this is discussed below). For this reason, the rejection under 35 U.S.C. §102(b) is improper. Claims 4-8 and 10-17 were rejected under 35 U.S.C. §103(a) on the underlying assumption that Favreau anticipated independent claim 1. Since this underlying assumption is incorrect (as is discussed below), the rejection of these claims is also improper.

Independent claim 1 requires that the radiation collection device be "electromechanical." An electromechanical device is a mechanical device that is actuated electrically. See WEBSTER'S ENCYCLOPEDIA UNABRIDGED DICTIONARY OF THE ENGLISH LANGUAGE, 1996. Favreau teaches the use of a mirror or prism as a radiation collection device. See col. 3, lines 10-12. Such devices are not electromechanical. Applicants note that Favreau contains no suggestion that an electromechanical collection device be used in place of the devices disclosed in Favreau. Further, given the purpose of the collection device taught by Favreau, i.e., to direct light coming

from an immobile source (reference numeral 15 in FIG. 2) to an immobile set of devices (reference numerals 21 and 22 in FIG. 2), there exists no motivation whatsoever to modify the telecine of Favreau to make use of a collection device that is actuated in any way, let alone electrically actuated. For these reasons, claim 1 and its dependent claims (claims 2-17) are neither anticipated nor rendered obvious by Favreau. Applicants respectfully request reconsideration of and withdraw of the rejections of claim 1-17.

Allowability of Claim 18

Claim 18 was rejected under 35 U.S.C. §102(b) as being anticipated by Favreau. Applicants respectfully traverse this rejection.

Claim 18 requires a radiation collection device which is "disposed at a plane tangential to the outer surface" of the roll. Turning to FIG. 2 of Favreau, it is clear to see that the radiation collection device (reference numeral 20 in FIG. 2) taught therein is disposed at an angle that is approximately 45° askew from the surface of the roll (reference numeral 3 in FIG. 2). Further, Favreau contains no suggestion that the radiation collection device therein be oriented so as to be tangential to the outer surface. For this reason rejection of claim 18 under 35 U.S.C. §102(b) is improper. Applicants respectfully request reconsideration of and withdrawal of this rejection.

Allowability of claims 19-30

Each of claims 20-30 depends from independent claim 19. Claims 19 and 25 were rejected under 35 U.S.C. §102(b) as being anticipated by Favreau. According to the Office Action, Favreau teaches each element recited by independent claim 19, including a "radiation collection device disposed in [a] roll." In fact, Favreau does not teach a radiation collection device disposed in a roll (this is discussed below). For this reason, the rejection of claims 19 and 25 under 35 U.S.C. §102(b) is improper. Claims 24 and 26-30 were rejected under 35 U.S.C. §103(a) on the underlying assumption that Favreau anticipated independent claim 19. Since this underlying assumption is incorrect (as is discussed below), the rejection of these claims is also improper. Claims 20-23 were not examined due to a typographical error that affected the dependency chain in these claims. This error has been corrected, and claims 20-23 are now allowable for at least the same reason that claim 19 is allowable.

Independent claim 19 recites a "radiation collection device disposed in [a] roll." The Office Action cites FIG. 1 of Favreau as disclosing such an arrangement. Applicants respectfully point out that FIG. 1 of Favreau is a side view of a telecine. As such, FIG. 1 does not depict front-to-rear depth of the telecine. However, FIG. 2 is a cross-sectional top view of the telecine depicted in FIG. 1, and clearly depicts the front-to-rear depth of the telecine. As can be seen from FIG. 2, the radiation collection device therein (identified by reference numeral 20 of FIG. 2) is not disposed in the roll (identified by reference numeral 3 in FIG. 2). Further, there exists no suggestion in Favreau to modify the telecine to include such a feature. For this reason, claim 19 and its dependent claims, claims 20-30, are neither anticipated nor rendered obvious by Favreau. Thus, Applicants respectfully request reconsideration and withdrawal of the rejections of claim 19-30.

Allowability of Claim 31

Claim 31 was rejected under 35 U.S.C. §103(a) as being obvious in view of Favreau. According to the Office Action, it would have been obvious to one of ordinary skill in the art to incorporate "features and limitation commonly known in the art." Applicants respectfully traverse this rejection.

Claim 31 requires "a radiation collection device movably disposed" in an opening on the outer surface of a roll. Although the Examiner contends that such a feature is well known in the art, Applicants traverse this contention. Applicants request the Examiner to cite a reference depicting such a feature, as required by MPEP §2144.03.

Applicants respectfully contend that a radiation collection device movably disposed in an opening on the outer surface of a roll is not known in the art, and that for this reason claim 31 is allowable. Applicants respectfully request reconsideration and withdrawal of the rejection of claim 31.

Conclusion

Claims 1-31 remain pending in the application. These claims are believed to be allowable for the reasons set forth above. This amendment is believed to be responsive to all points raised in the Office Action. Accordingly, Applicants respectfully request prompt reconsideration, allowance, and passage of the application to issue. Should the Examiner have any remaining questions or concerns, the Examiner is urged to contact the undersigned by telephone at the number below to expeditiously resolve such concerns.

Respectfully submitted,

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Date

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